December 7, 1998

MEMORANDUM

SUBJECT: ERROR CORRECTION. Response to Comments on EPA's Methyl Parathion Draft Health Effects Division Chapter of the Reregistration Eligibility Decision Document. PC Code: 053501, Case # 818931.

FROM: Diana Locke, Ph.D.
Toxicologist
Reregistration Branch II
Health Effects Division (7509C)

THRU: Alan Nielsen, Branch Senior Scientist
Reregistration Branch II
Health Effects Division (7509C)

TO: Mark Wilhite, Acting Chief
Reregistration Branch I
Special Review and Reregistration Division (7508W)

The attached errata list for methyl parathion was generated in response to the document *Comments on EPA's Methyl Parathion Draft Health Effects Division Chapter of the Reregistration Eligibility Decision Document* (November 6, 1998) submitted by Cheminova Agro A/S in Phase 1 of the Public Participation Process. The errata list is to accompany the HED chapter and its attached discipline chapters. Some of the comments concern issues and/or Agency policy and will more appropriately be dealt with during Phase 4. The registrant needs to work with the Agency on changes and/or clarification of label language before a re-evaluation of the risk can be made.

December 7, 1998

METHYL PARATHION ERRATA

This memo serves to correct errors (Phase 2) made in the disciplinary chapters written for the methyl parathion Reregistration Eligibility Document (RED), completed September 1998. This is in response to comments made on errors in Phase 1 of the Public Participation Process. Some of the comments made by the registrants do not address errors, but rather issues and policy, and will be addressed, as appropriate, in Phase 4.

A. Use Patterns for Methyl Parathion (p. 12-13 of Comments on EPA's Methyl Parathion)

1. The Agency concurs that Cheminova and Griffin Corporation are producers and Elf Atochem is a formulator.

2. This issue is deferred until Phase 4.

3. The Agency concurs.

4. All the registrant's labels do not clearly and specifically prohibit uses around the home by certified applicators. The registrants will need to work with the Agency to develop acceptable label language prohibiting use around dwellings.

5. The Agency does not consider the inclusion of kohlrabi in its preliminary risk assessments an error. Methyl parathion is currently registered for use on kohlrabi and a tolerance for residues of methyl parathion is currently established in/on kohlrabi at 1 ppm (40 CFR 180.121). HED, via the Residue Chemistry Chapter to the Methyl Parathion Reregistration Eligibility Decision (RED) document (7/11/98), has recommended in favor of establishing a crop group tolerance for residues of methyl parathion in/on Vegetables, leafy, Brassica (cole) at 1 ppm concomitant with the revocation of individual tolerances currently established on broccoli, Brussels sprouts, cabbage, cauliflower, collards, kale, kohlrabi, and mustard greens. The Vegetables, leafy, Brassica (cole) tolerance, if established, would cover residues of methyl parathion in/on kohlrabi.

B. **HED Chapter** (p. 13 of Comments on EPA's Methyl Parathion)

1. The Agency concurs that Cheminova and Griffin Corporation are producers and Elf Atochem is a formulator.

2. This is not an error. Agency policy directs that acute dietary endpoints be expressed as acute RfD.

3-4. A number of studies have been received by the Agency and are in review. These data will

be addressed during Phase 4, as appropriate.

5. The Agency does not consider residue data requirements for sorghum forage and rape forage as errors, if uses of methyl parathion on grain sorghum and rape are being supported under reregistration. Methyl parathion is currently registered for use on sorghum (unspecified) and rape and tolerances for residues of methyl parathion are currently established in/on sorghum (0.1 ppm), sorghum fodder (3 ppm), sorghum forage (3 ppm), and rape seed (0.2 ppm).

C. Toxicology Chapter (p. 14 of Comments on EPA's Methyl Parathion)

1. The procedures should be clarified as follows; ppm should be changed to mg/kg every other day and the route of administration should be stated as oral.

2. Citations for Fuchs (1976), Gupta (1985), and Benke (1975) should list these years.

3. The dose should be expressed as "7.5 mg/kg/d or higher."

4. A developmental neurotoxicity study is required.

D. Hazard Identification Document (p. 14 of Comments on EPA's Methyl Parathion)

1,2,4. The errors are the same as in the Toxicology Chapter.

3. 7.5 mg/kg/d should be changed to 2.5 mg/kg/d.

E. Residue Chapter (p. 15-16 of Comments on EPA's Methyl Parathion)

1. The word "respectively" should be added.

2-3. A number of studies have been received by the Agency and are in review. These data will be addressed during Phase 4, as appropriate.

4. The Agency acknowledges that this was an incomplete statement which had no impact on the risk assessment but which will be corrected during Phase 4, as appropriate.

5. This is not an error.

6. The Agency does not consider residue data requirements for sweet potatoes an error. For clarification, data are required depicting methyl parathion residues of concern in/on potatoes and sweet potatoes resulting from the maximum use rates of the microencapsulated (Mcap) formulation of methyl parathion. The Agency understands that these uses are being supported by Elf Atochem. No data are currently available to support the use of the Mcap formulation of

methyl parathion on potatoes or sweet potatoes. However, if potato field trial data are generated using the Mcap formulation, then these data might be acceptable for translation to support the use of the Mcap formulation on sweet potatoes as well.

7. This is an issue deferred until Phase 4.

F. Metabolism (p. 16 of Comments on EPA's Methyl Parathion)

1. This is not an error and is consistent with Agency policy.

G. Occupational Exposure (p. 16-17 of Comments on EPA's Methyl Parathion)

1. This is a standard Agency title for the exposure chapter.

2. As was clearly stated in the cover memo for the HED chapter and attachments, the decision to not apply the FQPA factor to occupational exposures was made by the FQPA Safety Factor Committee after the exposure chapter was completed.

3. This is not an error.

4. The Agency concurs that "Min Rate" should be "Max Rate."

5. The Agency concurs that the maximum rate should be 20,000 cm^2/hr.

6. As was clearly stated in the cover memo for the HED chapter and attachments, the exposure chapter was completed prior to finalization of the registrants' decision to not support granular formulations.